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ATTN: Patent Application 10/803,507
United States Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450
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Dear Mr. Jeanglaude:

As per our phone conversation earlier today, this letter is to respond to your August 12, 2005 office action on which you rejected Claims 1-23 based on the article "A Linear Time, Constant Space Difference Algorithm" by Burns and Long.

Although the parameters M and N in this article denote the sizes of the two files (the source file and target files) as do the parameters m and n in my patent, the parameter K is used differently in this article than in my patent.
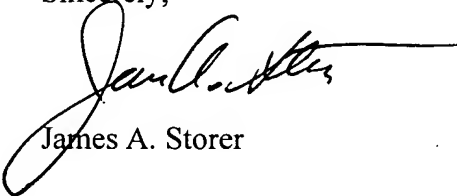
This article teaches one to use K space in addition to the space for the source and target files, for a total of $(M+N) + K$ space. That is, the phrase "Constant Space" in the title of this article refers to space *in addition* to $M+N$.

In contrast, all independent claims of my patent require that T can be recovered from S using at most MAX$\{m,n\}+K$ space where $0 \leq K < $ MIN$\{m,n\}$. So even when K is as large as allowed by my claims ($K = $ MIN$\{m,n\}-1$), it must be that less than $m+n$ space is used (since the quantity MAX$\{m,n\}+K$ can be at most $m+n-1$). That is, the phrase "In-Place" in the title of my patent refers to the fact that decoding uses space *less* than $m+n$.

I hope that this explanation suffices for you to allow my claims, please feel free to call or write me with any further questions.

Thank you.

Sincerely,

James A. Storer